

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,)	
)	
Plaintiff)	
)	
V.)	Civil Action No. 04-11935-DPW
)	
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.)	
)	
Defendants)	

DECLARATION OF DAVID S. SCHUMACHER

I, David S. Schumacher, depose and state the following:

1. I am an attorney with the law firm Goodwin Procter LLP, Exchange Place, Boston, Massachusetts, 02109, and a member in good standing of the bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts.
2. Goodwin Procter is counsel to Plaintiff Sheila Porter ("Mrs. Porter") in the above-captioned proceeding. I submit this Declaration in support of Mrs. Porter's Opposition to the Suffolk Defendants' Motion to Compel and Cross-Motion for Protective Order.
3. Attached hereto as Exhibit 1 are true and accurate copies of portions of the deposition of Sheila Porter, dated May 18 and 26, 2005.
4. Attached hereto as Exhibit 2 are true and accurate copies of Plaintiff's Responses and Objections to the Interrogatories of the Suffolk Defendants.
5. Attached hereto as Exhibit 3 is the Declaration of Sheila Porter.

6. Attached hereto as Exhibit 4 are true and accurate copies of portions of the deposition of Elizabeth Keeley, dated May 12, 2005.

7. Attached hereto as Exhibit 5 are true and accurate copies of portions of the deposition of Viktor Theiss, dated May 24, 2005.

8. Attached hereto as Exhibit 6 is a true and accurate copy of the Affidavit of Christa Snyder, dated June 9, 2005.

Signed under the penalties of perjury this 14th day of November, 2005.

/s/ David Schumacher
David S. Schumacher

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